

1 significant privilege problems. The parties will work together to resolve any such issues,  
2 including, if necessary, a proposed stipulated protective order relating to confidentiality.

3 **V. CHANGES TO LIMITATIONS ON DISCOVERY [Rule 26(f)(3)(E)]**

4 Other than as stated above, the parties have not reached any agreements resulting in  
5 discovery limits different from the Federal Rules of Civil Procedure or this Court's Local Rules.

6 Defendants contend that ten seven-hour depositions per side are more than adequate, and  
7 that no relief from the federal rules limitations on the number of interrogatories is necessary  
8 (except that Defendants propose two phased rounds of discovery, as set out in more detail in the  
9 Case Management Conference statement filed contemporaneously herewith).

10 **VI. OTHER ORDERS [Rule 26(f)(3)(F)]**

11 The parties request that the Court allow a procedure whereby, pursuant to stipulation and  
12 order, the page limits applicable to the class certification motion and opposition thereto and any  
13 motion for summary judgment or adjudication and opposition thereto may be altered or enlarged.

14  
15 DATED: February 8, 2008

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18 Attorneys for Defendants  
19 California Redwood Company and Simpson  
20 Timber Company

21 DATED: February 8, 2008

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